

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Case 1: 23-cv-5875-JGK

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D. G. SWEIGERT

**RULE 26(F) STATUS
NOTICE AND
REQUEST FOR
LEAVE TO FILE
PROPOSED
MOTIONS**

Plaintiff,

-against-

JASON GOODMAN
Defendant.

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Defendant Jason Goodman respectfully submits this Rule 26(f) Status Notice regarding the mandated conference and the deleterious effects of Plaintiff's ongoing inappropriate conduct.

Pursuant to Judge Koeltl's order, (Dkt No. 145) the parties were to meet and confer for the purpose of filing a Rule 26(f) report by November 14, 2024. To date, Plaintiff has not attempted to initiate a Rule 26(f) conference. Instead, Plaintiff has engaged in premature, unauthorized and inappropriate third-party discovery efforts including threats and unilaterally imposed deadlines. Most outrageously, Plaintiff has issued discovery demands to YouTube (Alphabet, Inc.) and Patreon in an effort that can only be construed as deliberate harassment.

Plaintiff knows these platforms are essential to Defendant's business as he attempts to use this extrajudicial harassment to destroy defendant's ability to conduct business or to exercise the first amendment on social media irrespective of the outcome of this case. Plaintiff has used mass reporting tactics in the past to trigger account bans and disrupt Defendant's ability to earn a livelihood. Here, Plaintiff uses this legal action as a tool of extrajudicial harassment designed to silence Defendant and dismantle his business relationships with these social media platforms.

Over the past eight years, Plaintiff has initiated multiple malicious mass reporting campaigns aimed at social media platforms he knows to be essential to Defendant's income. Plaintiff has stated his intent to get Defendant "banned from the internet" and to sue Defendant

“for the rest of his life.” Plaintiff’s long history of egregiously violative conduct demonstrates his commitment to these goals and his failure to meet and confer in good faith as required by FRCP Rule 26(f) demonstrates ongoing refusal to comply with the rules or orders of this Court.

Judge Koeltl previously dismissed Patreon, Inc., Alphabet, Inc., and related parties from this case without prejudice. However, due to the Plaintiff’s current actions, it is now necessary to reintroduce these entities as parties in the interest of equitable relief and justice.

REQUEST FOR LEAVE TO FILE

Defendant seeks the Court’s leave to file the attached motion and exhibit which addresses Plaintiff’s violations of FRCP Rule 26(f) and misuse of this litigation as a weapon against Defendant’s business and access to income-generating platforms. Judicial intervention is needed to prevent ongoing harm and ensure that Plaintiff does not continue his abuse of the discovery process. Attached to this status notice is a proposed motion seeking specific relief intended to ensure the fairness of this litigation. Defendant respectfully requests leave to file the motion:

EXHIBIT A: Proposed Motion for Equitable Relief and a Protective Order

EXHIBIT B: Improper emails sent by Sweigert in violation of FRCP Rule 26(f)

Dated: New York, New York November 3, 2024

Respectfully submitted,



Jason Goodman
Pro Se Defendant
truth@crowdsourcethetruth.org
252 7th Avenue Apt 6s
New York, NY 10001
347-380-6998

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Case 1: 23-cv-5875-JGK

-----X
D. G. SWEIGERT

Plaintiff,

**(PROPOSED)
MOTION FOR
EQUITABLE RELIEF**

-against-

JASON GOODMAN
Defendant.

-----X

Defendant Jason Goodman respectfully submits this proposed motion, accompanying the Rule 26(f) Status Notice, seeking equitable relief and a protective order to address Plaintiff's misuse of legal process, which has repeatedly disrupted Defendant's business and interfered with essential third-party relationships in defiance of this Court Order, (Dkt No. 145).

BACKGROUND AND JUSTIFICATION FOR RELIEF

Since June 2017, Plaintiff has systematically used mass reporting tactics on platforms such as YouTube, resulting in repeated terminations of Defendant's channels. Plaintiff's actions have led to the unwarranted suspension of Defendant's accounts and severely impacted his ability to conduct business. These actions were not prompted by platform policy violations but rather by Plaintiff's deliberate, sustained campaign to silence Defendant and remove his income.

Defendant's business is heavily reliant on YouTube and Patreon for content distribution and revenue generation. Plaintiff's malicious reporting has prevented Defendant from recovering his previous audience size and income, forcing Defendant into financial hardship. Plaintiff's actions cause economic harm and ongoing disruption to defendant's ability to conduct business.

Plaintiff's ongoing contact with YouTube, Patreon, and other platforms essential to Defendant's business reveals a pattern of using litigation inappropriately as a means to disrupt Defendant's professional and personal life, irrespective of the case's outcome.

REQUEST FOR EQUITABLE RELIEF AND INJUNCTION

In light of Plaintiff's abuse of third-party reporting mechanisms and inappropriate contact with platforms critical to Defendant's business, Defendant respectfully requests that the Court:

- a) Order YouTube (Alphabet, Inc.) to review all complaints filed by Plaintiff regarding Defendant's channels to determine if these complaints unjustly led to channel terminations.
- b) Direct YouTube to restore any channels wrongfully terminated due to Plaintiff's actions.
- c) Issue a protective order enjoining Plaintiff from communicating by any means with YouTube, Alphabet, Patreon, or any other third-party regarding Defendant, Defendant's business, or any matter concerning Defendant without prior approval from the Court.

CONCLUSION

Plaintiff's repeated, extrajudicial interference has caused substantial harm to Defendant and jeopardizes his livelihood. To preserve fairness and prevent misuse of this litigation as a means of harassment, Defendant requests that the Court grant the proposed relief and enjoin Plaintiff from further third-party contact or communication concerning Defendant.

Dated: New York, New York November 3, 2024

Respectfully submitted,



Jason Goodman
Pro Se Defendant
truth@crowdsourcethetruth.org
252 7th Avenue Apt 6s
New York, NY 10001
347-380-6998

EXHIBIT B

DS

From: Spoliation Notice spoliation-notice@mailbox.org
Subject: Re: Fwd: Stipulated Order in RE: Sweigert v. Goodman, 23-cv-05875-JGK
Date: November 3, 2024 at 7:58 PM
To: truth@crowdsourcethetruth.org, jasongoodman3d@gmail.com, jason@21stcentury3d.com, Spoliation Notice spoliation-notice@mailbox.org
Cc: colin@patreon.com, tyler@patreon.com, legal@patreon.com

Attention Mr. Goodman,

This is an attempt by the plaintiff to comply with a discovery conference in federal litigation concerning you and your social media business. You are obligated to transmit to the plaintiff any requested discovery materials that he demands that are needed to prosecute this legal action against you.

Pursuant to the federal rules, rule 26(f), you are being requested to establish three meeting dates where the two parties can communicate via telephonic means for a discussion known as a "meet and confer".

Please advise the plaintiff immediately as to the anticipated delivery date of video broadcast media for all entertainment shows delivered by the Patreon platform concerning the plaintiff.

This includes all video broadcasts where you have referred to the plaintiff as a mentally ill wife swapping Paperclip Operation Nazi, mentally ill Nazi Operation Paperclip participant, wife swapper, son of a Nazi war criminal, war criminal, etc.

This includes all video content in which you refer to yourself as a Nazi hunter, Nazi war criminal hunter, Nazi investigator, investigator of war criminals, investigator of criminals involved in the Nazi Operation Paperclip etc.

You are demanded to provide your estimated completion time to provide copies of all thumbnail illustrations you have created relying on the likeness of the plaintiff or of George Webb Sweigert. This includes all depictions of the plaintiff in Nazi uniforms, in recreational vehicles with ham radios, in illustrations demonstrating the plaintiff writing letters to the Manhattan District Attorney's office, depictions of the plaintiff as a cocktail waitress in a brown mini skirt and blue blouse with Go-Go boots, etc.

You are hereby commanded to respond to this demand within 72 hours. After such time a motion for sanctions will be submitted to compel your compliance.

D. Sweigert

On 10/29/2024 7:06 PM PDT Spoliation Notice <spoliation-notice@mailbox.org> wrote:

Kindly see attached

On 10/28/2024 6:57 PM PDT Spoliation Notice <spoliation-notice@mailbox.org> wrote:

----- Original Message -----

From: Spoliation Notice <spoliation-notice@mailbox.org>
To: Spoliation Notice <spoliation-notice@mailbox.org>
Cc: "jason@21stcentury3d.com" <jason@21stcentury3d.com>, Jason Goodman <truth@crowdsourcethetruth.org>, "jasongoodman3d@gmail.com" <jasongoodman3d@gmail.com>
Date: 10/28/2024 6:56 PM PDT
Subject: Sweigert v. Goodman, 23-cv-05875-JGK

D. G. SWEIGERT, C/O, MAILBOX, PMB 13339
514 Americas Way, Box Elder, SD 57719
[Spoliation-notice@mailbox.org](mailto:spoliation-notice@mailbox.org)

October 28, 2024

Sweigert v. Goodman, 23-cv-05875-JGK
Associated action: 23-cv-06881-JGK

DS

From: Spoliation Notice spoliation-notice@mailbox.org 
Subject: RULE 26(f) CONFERENCE
Date: November 2, 2024 at 5:43 PM
To: bmargo@wsgr.com, colin@patreon.com, tyler@patreon.com, truth@crowdsourcethetruth.org, Spoliation Notice spoliation-notice@mailbox.org, jasongoodman3d@gmail.com, jason@21stcentury3d.com

REF: RULE 26(f) CONFERENCE

Jason,

Pursuant to the Court's Order attached please find a draft Rule 26(f) pleading.

Third party discovery is indicated in the attached courtesy copies.

Best,

D. G. Sweigert

23-cv-5875-JGK--.pdf

107 KB



DS

From: Spoliation Notice spoliation-notice@mailbox.org 
Subject: Re: RULE 26(f) CONFERENCE
Date: November 3, 2024 at 12:42 PM
To: bmargo@wsgr.com, colin@patreon.com, tyler@patreon.com, truth@crowdsourcethetruth.org, jasongoodman3d@gmail.com, jason@21stcentury3d.com, Spoliation Notice spoliation-notice@mailbox.org

Counsel,

This informs you that the below undersigned reserves his rights to bring litigation against your organizations (see previous dismissals without prejudice).

The attached provides justification for the documents that will be sought in discovery against the channel owner named Jason Goodman.

Best,

D. Sweigert

On 11/02/2024 2:43 PM PDT Spoliation Notice <spoliation-notice@mailbox.org> wrote:

REF: RULE 26(f) CONFERENCE

Jason,

Pursuant to the Court's Order attached please find a draft Rule 26(f) pleading.

Third party discovery is indicated in the attached courtesy copies.

Best,

D. G. Sweigert

23--cv--5875 - Copy.pdf



THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Case 1:23-cv-05875-JGK

-----X
D. G. SWEIGERT

Plaintiff,
-against-

JASON GOODMAN
Defendant.

-----X
**CERTIFICATE OF
SERVICE**

It is hereby certified that Defendant Pro Se, Jason Goodman, served Plaintiff with a copy of 26(f) Status Notice via USPS to that address below

D. G. SWEIGERT, C/O
PMB 13339, 514 Americas Way,
Box Elder, SD 57719

Dated: New York, New York November 3, 2024

Respectfully submitted,



Jason Goodman
Pro Se Defendant
truth@crowdsourcethetruth.org
252 7th Avenue Apt 6s
New York, NY 10001
347-380-6998